

Nov. 29, 2016

XP Vehicles Group
Trustee Office
legal@xpvehicles.com

Gregg Galardi – Attorney For Gawker Media
Ropes & Grey
1211 Avenue of the Americas
New York, NY 10036-8704
gregg.galardi@ropesgray.com

Dear Gregg:

Thank you for your letter dated November 22, 2016 which was received today Nov. 29, 2016.

As we have asked Prime Clerk staff, please email any time-sensitive material to us as well as FEDEXing materials. As most of your materials have been received within a day or two of a critical court deadline, it makes it appear that someone is trying to cut off our opportunity to have fair use of the justice system, by removing every opportunity for us to use the justice system. If you send us communications in a manner contrived to give us no time to research the materials and draft a response, it could invalidate your entire bankruptcy case and lead to a re-do of the entire case in 2017.

We are not lawyers and we are unable to expend the hundreds of thousands of dollars quoted by law firms to represent us in this case. Our cash is temporarily limited because of the financial retribution attacks on us by Gawker Media and their handlers. Gawker did this, in part, to damage us financially in hopes of reducing our resources. I guess the joke is on them now. Therefore, you must re-write your letter to us using normal language and without all of the trick double and triple-meaning secret legal phrases that only a high-end corporate lawyer, such as yourself, could possibly comprehend the legal implications of.

We are trying to get Peter Thiel to pay for our prosecution of your parties in this case, but we have not reached him yet. If any of the other creditors want to pay for our lawyers in this matter, we will give them a percentage of our winnings. We are copying this letter to every creditor so maybe one of them might let us know if they want to sponsor a law firm for us.

Gregg, we are mostly aligned with the “Independent” political affiliation. In other words, we don’t care which politicians go to prison for corruption, from any party. Having said that, it is hard to not notice that a man just won the Presidency of the United States simply because he engaged in “*Plain Speaking*”. Since most of America just made global history by putting the Trump Administration into power, I think we should respect the edict that the voters put forth calling for more plain speaking.

As technologists, we wanted to author this letter with that kind of *plain spoken English*. We want to, for clarity, confirm the meanings of some terms that we may tend to use. When you write us your normal language letter, please define any legal terms that you use. Here is such an example from a term we will use:

The first technology term we want to define is: “**Bullshit!**”

This term refers to the use of items in a communication which are known by most of the world to be false. For example, you plead that Gawker Media only has a few million dollars left, yet our CIA, FBI and major media colleagues say that there are over a billion dollars in assets. Are you lying? Are your investigators lying in order to scam the creditors? Are your investigators incompetent? Thus, we say that your pleading of poverty on behalf of Gawker Media is absolute and total “**BULLSHIT!**” (A technical term). We and EVERY creditor should be able to get each of our full financial demands. We sent you a general list of over \$1B in asset areas. What say you to that list? We don't see a single document in the court records where you fully value the brand value, the IP value, the DNS route values, the Google Cartel internet search rigging value, the Eastern Bloc bank accounts, the tax evasion trusts and other novel goods.

The next terms is not so much a technology term as, well, just a big term that we want to be precise about.

The term is: “**Treason**”.

It is defined by Merriam-Webster as:

Definition of *treason*

1. **1 : the betrayal of a trust : [treachery](#)**
2. **2 : the offense of attempting by overt acts to overthrow the government of the state to which the offender owes allegiance or to kill or personally injure the sovereign or the sovereign's family**

In fact, those federal and media investigators, along with everybody from Wikileaks, to Senators, to ex-Gawker staff, have now provided evidence that proves that Gawker Media, working with Google, engaged in the legal definition of “Treason” by illegally manipulating the Obama election and attempting to manipulate the Hillary Clinton election. The news and internet rigging is now covered in over a million news stories. It is laughable to deny it now. You have have heard of Jofi Joseph, the White House staffer in the West Wing who Tweeted the daily dysfunction of the Obama White House. Did you know there have been hundreds of White House staffers, like Jofi Joseph, doing the same sort of thing? The toothpaste is out of the tube. The evidence against Gawker Media and Gawker's handler/clients is overwhelming.

Before we did vehicle and energy innovation we did law enforcement and intelligence innovation. Rest assured that the new Attorney General and the soon-to-be upgraded FBI are chomping at the bit to crush the nuts of the Gawker Cartel. We will help them do that if you don't settle up with us. In fact, we have bcc'd this email to Jeff Sessions, Trey Gowdy and pretty much everyone in the new Administration, news media and law enforcement that Gawker would never want this seen by. We love epic transparency. Please know that every three-letter agency you have ever heard of now has a copy of this letter. They have all seen the evidence samples at <http://communityone.info> and the many other peer-to-peer law enforcement sites. They each have vast additional files on this matter.

Via this letter, we offer the services of “CODE RED”, our law enforcement affiliate, to each and every Gawker Creditor. CODE RED, working with high level resources, will hunt down every ACTUAL

Gawker/Denton/Cartel asset. CODE RED is like **Stratfor** on steroids. CODE RED will charge \$310K for the work, which, interestingly, is the same amount that XP needs for legal costs for this case.

We hereby demand again, that the Department of Justice appoint a “Special Prosecutor” to oversee this organized crime matter. We will continue that demand under the Trump Administration in 2017.

We hereby demand again, that the court appoint equitable legal counsel to our firm.

Thanks for the offer of the \$25K. That will pay for a couple days of lawyers in this case. Come back when you have a real number. The thousands of people in our core team and the hundreds of millions of voters will continue to hunt down (WITHOUT BREAKING A SINGLE LAW AND WITH THE HELP OF LAW ENFORCEMENT) every Gawker employee, investor, handler, and associate that tried to “kill us”, and that did kill our colleagues and peers (Conley, Motwani, Rich, Kumar, Slym, Bird, etc.).

Adrian Covert, Nick Denton, John Herrman, John Cook, Eric Schmidt and Larry Page need to know that hell will freeze over (plain speaking colloquialism) before we end our investigations of every hooker, rent boy, secret trust fund, stock scam, credit card transaction, paypal transaction, tax evasion, Russian covert accounts, bitcoin transaction, Uber account, and everything the Gawker people ever plugged in, turned on, spoke into or typed on. We will never stop until we get restitution for the malicious attacks on us. Guess what?; NSA, GCHQ and FBI records now CAN BE Subpoenaed!

We look forward to having our day in court with equitable representation, and to taking the stand against Gawker Media on behalf of ourselves and America. We already know what the NSA, CIA, DIA, FBI, OSC, GAO, Senate, and all the others already have on file, and it will “cook Gawker’s geese” (plain speaking colloquialism). Settle this now and pay our damages or EVERYONE will pay the price. We can take every suspect down without breaking a single law because they did CRIMES! We have pre-pledged our future assets to private eyes that will get this done, even if none of us are around to see that day.

Your settlement offer is based on falsified asset values. First go find the real assets or hire us to find them or just call James Comey at the FBI, who we report to, and ask him! Your asset numbers are fake until you get closer to finding \$1B in Gawker Assets!

Don’t BULLSHIT US! Pay your dues!

Thank you.

XP Group

BCC: Agencies, Media, Creditors, Congress



ROPES & GRAY LLP
1211 AVENUE OF THE AMERICAS
NEW YORK, NY 10036-8704
WWW.ROPESGRAY.COM

November 22, 2016

Gregg Galardi
T 212 596-9139
gregg.galardi@ropesgray.com

XP Vehicles Group
c/o Scott Redmond
601 Van Ness Avenue
San Francisco, California 94102

Re: *In re Gawker Media LLC* (Case No. 16-11700 (SMB), Bankr. S.D.N.Y.)

Dear Mr. Redmond:

As you know, my firm is bankruptcy counsel to Gawker Media LLC, Gawker Media Group Inc. and Gawker Hungary Kft. (f/k/a Kinja Kft.), all as debtors and debtors in possession (the "Debtors"), in chapter 11 cases pending in the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court"), No. 16-11700-SMB (the "Bankruptcy Cases"). I am writing to you regarding the proofs of claim that "XP Vehicles Group" has filed against the Debtors (the "Claims"), our Objections to those Claims (Docket Nos. 393, the "Claims Objection"), and the Claims Estimation and Plan Reserve Procedures (as defined below). Because the hearings on December 1 and December 13 in the Bankruptcy Court are rapidly approaching and will significantly impact your recovery on the Claims, I wanted to set forth how the Debtors intend to proceed regarding the Claims at those upcoming hearings and begin a dialogue regarding efficiently resolving the Allowed amount of the Claims and the potential distribution on such Claims.

As you probably know, the Debtors are presently soliciting votes on a proposed chapter 11 plan (the "Plan"). That Plan, we believe, maximizes the funds available for all stakeholders, and includes highly beneficial settlements that the Debtors have reached with a number of creditors and the official creditors committee, and calls for speedy resolution of many other claims, including the Claims (the "Plan Settlements").

Accordingly, the Debtors believe it is in the best interests of their stakeholders to proceed on the Claims Objection in the Bankruptcy Court at the December 1 hearing. We also wish to make clear that if the Bankruptcy Court does not disallow the Claims based on the current Objection at the December 1 hearing, the Debtors presently intend to seek estimation of the Claims at the December 13 hearing. In that regard, on November 14th, the Debtors filed and served on you a motion seeking approval of procedures for estimating claims in connection with the setting of reserves established by the Plan (the "Claims Estimation and Plan Reserve Procedures"). The hearing to approve procedures is also scheduled for December 1, 2016, and objections are due November 28, 2016. If approved, those procedures would apply to the Claims and under the

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proposed Claims Estimation and Plan Reserve Procedures, the Debtors intend to seek to estimate the Claims at a hearing commencing on December 13, 2016, in connection with the confirmation hearing.

Notwithstanding the above and the Debtors' position that the Claims should be disallowed, it would benefit all parties, including XP Vehicles as an alleged creditor, to avoid the costs of litigation, especially given the limited recoveries that it would likely receive under the Plan, if that Plan is confirmed. Under the Plan, and as a result of the Plan Settlements, unsecured creditors (with allowed claims) of Gawker Media are to receive their share of the Gawker Media Claims Reserve of about \$3.75 million in cash and, if that were not adequate to pay unsecured claims in full, additional cash that would bring the total amount to \$6.5 million. So, if you believe the distribution on the Claims is in excess of this amount, XP Vehicles likely would need to not only litigate the merits of the underlying Claims but also Plan confirmation and the Plan Settlements. We point this out to draw your attention to the issues to be litigated and the potential costs, and so we are not "talking past each other" in any negotiations regarding the Claims and procedures. The Debtors believe that as a result of the Plan Settlements and most particularly the settlement on the allocation of Sale Proceeds, recoveries could be limited regardless of whether XP Vehicles ultimately prevails on the merits of the Claims.

Thus, we think it mutually beneficial for the parties to agree about procedures for resolving the Claims or setting a reserve. So, to proceed expeditiously and cost effectively, either (i) you should provide a realistic proposed reserve, or (ii) we could attempt to settle the Claims. As to settlement, the Plan includes a settlement offer for the Claims, via the so-called Convenience Class. You are entitled to opt-in to the Convenience Class, and receive a single payment of \$25,000 (which we would anticipate making before year-end).

If that amount is not acceptable, you should provide us with a settlement offer. That offer should be realistic. While we can give no assurances as to whether a particular offer will be acceptable, we will consider the settlement offer and if appropriate enter into good faith negotiations regarding a settlement of the Claims.

Should you have any questions regarding this matter or like to discuss the matter, please do not hesitate to contact me or my partner Ross Martin.

Sincerely,



Gregg M. Galardi

